

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al	:	
	:	
vs.	:	C.A. No. 04-312-L
	:	
JEFFREY DERDERIAN, et al	:	
	:	
ESTATE OF JUDE B. HENAUXT, et al	:	
	:	
vs.	:	C.A. No. 03-483-L
	:	
AMERICAN FOAM CORPORATION, et al	:	

MOTION OF THE DEFENDANTS, JEFFREY DERDERIAN,  
MICHAEL DERDERIAN, AND DERCO, LLC, TO APPROVE THE SETTLEMENT

Defendants, Jeffrey Derderian, Michael Derderian, and DERCO, LLC, move that the Court approve the settlement of the Plaintiffs' claims against said Defendants for payment in the amount of \$813,218.82, plus or minus, from the Defendants' bankruptcy estates, less such sums as are allowed as administrative costs of the Bankruptcy Estates of the Defendants, as a "good faith settlement," pursuant to Rhode Island Gen. Law §§ 10-6-7; 10-6-8 (the Rhode Island Uniform Contribution Among Tortfeasors Act).

In support of their motion, the Defendants rely on the attached memorandum of law.

JEFFREY DERDERIAN, MICHAEL  
DERDERIAN, and DERCO, LLC  
By their attorneys,

/s/Anthony F. DeMarco

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and

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**CERTIFICATION**

I hereby certify that on the 4<sup>th</sup> day of June, 2009, I caused to be served a copy of the Defendants' Motion to Approve Settlement via electronic mail to all parties who are registered participants identified on the Notice of Electronic Filing or by other means to the counsel listed on the attached service list.

/s/Anthony F. DeMarco

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